

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IRENE SIMMONS AND RODELL SANDERS,)	Case No. 1:20-cv-1128
for themselves and others similarly situated,)	
)	Judge John J. Tharp Jr.
Plaintiffs,)	
v.)	Magistrate Judge Jeffrey I. Cummings
MOTOROLA SOLUTIONS, INC., and)	
VIGILANT SOLUTIONS, LLC,)	
)	
Defendants.)	

**DECLARATION OF CHERYL KRAS IN SUPPORT OF
DEFENDANTS MOTOROLA SOLUTIONS, INC.'S AND
VIGILANT SOLUTIONS, LLC'S REPLY IN SUPPORT OF
THEIR AMENDED MOTION FOR SUMMARY JUDGMENT**

I, Cheryl Kras, have personal knowledge of the statements contained in this declaration, and if called to testify, would state as follows:

1. I am employed full-time as a Senior Paralegal at the law firm Jenner & Block LLP and work on the team representing Defendants Motorola Solutions, Inc. and Vigilant Solutions, LLC ("Defendants") in this action.
2. I am familiar with Defendants' document productions in this case.
3. To date, Defendants have produced more than 1,000 contracts between Vigilant and public law enforcement agencies and other government public safety customers.
4. I have reviewed the metadata for Plaintiffs' Statement of Additional Fact Exhibit 6 (MOTOROLA_00049297-315), and have determined that the file name for that document is "LPR_Facial Recognition_Public Records Presentation_R1_060616 v2.pptx." This information was provided in the file name field for that document in the DAT file that was included with Defendants' April 7, 2022 production.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 14, 2022.

By: 
Cheryl Kras